

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

PARAGON COMPONENT SYSTEMS,
LLC,

Plaintiff,

Case No. 3:25-cv-00170-wmc

V.

QUALTIM, INC., CENTER FOR
BUILDING INNOVATION, LLC,
DRJ ENGINEERING, LLC, INSPIRED
PURSUITS, LLC, KIRK GRUNDAHL,
and SUZANNE GRUNDAHL,

Defendants.

**DECLARATION OF ROB EASON IN SUPPORT OF PARAGON'S
MOTION TO DETERMINE WHETHER EXHIBITS TO COMPLAINT
SHOULD BE SEALED**

I, Rob Eason, hereby declare:

1. I am an adult over the age of 21 and am competent to make this declaration. I am President of Clearspan Components, Inc., a Mississippi corporation ("Clearspan"). I previously served as Vice-President of Clearspan. I provide this declaration individually and on behalf of Clearspan. This declaration is based on my personal knowledge, including my knowledge of documents and information belonging to Clearspan.

2. After Dan Holland passed away in January 2024, Suzanne Grundahl sent James Holland and me an email (dated March 25, 2024) in which she forwarded an earlier email containing the subject line "Paragon-Clearspan-Qualtim-Truss Pal Business Roadmap Follow-up" and to which a Microsoft Word file titled "Paragon-

Clearspan-Qualtim Truss Pal IP-TS Roadmap.240325 Final Draft.docx" was attached. An authentic copy of this email and its attached are provided in Exhibit A to this declaration. I reviewed the Microsoft Word document attached to the March 25, 2024 email and compared it to Document 1-8 in this action, and the two documents appear to be the same.

3. I understand that Defendants contend that Paragon and its employees signed a non-disclosure agreement at a meeting with Defendants in August 2023. I did not attend such meeting, and I did not sign the related non-disclosure agreement referenced by Defendants. In fact, I do not recall signing any non-disclosure or confidentiality agreement with Defendants, whether for myself or Clearspan, and I do not recall any of the Defendants orally telling me to keep any information they shared with me confidential.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on the 18th day of March 2025 within the United States.



Mr. Rob Eason